FFIEC Proposed Revisions to the Uniform Financial Institutions Rating System

COMMENT LETTER

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August 17, 2026
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Mr. Amol Vaidya
Executive Secretary
Federal Financial Institutions Examination Council
L. William Seidman Center
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Re: Federal Financial Institutions Examination Council Request for Comment on Proposed Revisions to the Uniform Financial Institutions Rating System (Docket ID OCC-2026-0562)

Dear Mr. Vaidya:

On May 19, 2026, the Federal Financial Institutions Examination Council (FFIEC) issued a request for public comment[1] on revisions to the Uniform Financial Institutions Rating System (UFIRS), commonly known as CAMELS. That same day, Charles Cooper, Commissioner of the Texas Banking Department and Chairman of the FFIEC State Liaison Committee (SLC), issued a statement on behalf of the SLC[2] supporting the release of the revised CAMELS framework for public comment and noting critical considerations for any final CAMELS proposal, particularly the importance of a properly calibrated management rating.

On behalf of the Conference of State Bank Supervisors (CSBS),[3] National Association of State Credit Union Supervisors (NASCUS),[4] and American Council of State Savings Supervisors (ACSSS)[5] (collectively, state supervisors), we write to support the position of the SLC and encourage the FFIEC to maintain a durable CAMELS framework that will serve as a foundational safeguard for our dual chartering system for years to come.

For half a century, the CAMELS system has provided a common baseline for federal and state supervisors to assess the safety and soundness of United States financial institutions and to communicate those findings consistently following an examination.[6] Over that period, the CAMELS framework has been significantly revised only once – adding sensitivity to market risk as a component rating in 1996, along with certain other changes.[7]

Read the full comment letter.

- 1

FFIEC, Notice and Request for Comment, *Uniform Financial Institutions Rating System*, 91 Fed. Reg. 29128 (May 19, 2026) ("FFIEC RFC").

- 2

SLC, *FFIEC SLC Chairman Charles Cooper Statement on CAMELS update* (May 19, 2026) ("SLC Statement").

- 3

CSBS is the nationwide organization of state banking and financial regulators from all 50 states, the District of Columbia, and the U.S. territories. The views presented in this letter may not reflect the policy of individual states.

- 4

NASCUS is the professional association of the nation's 45 state and territorial credit union regulatory agencies that charter and supervise 1,688 state credit unions. Our mission is to forge a vibrant dual charter system by promoting a relevant, growth-oriented, and healthy state charter option. NASCUS's membership includes state regulatory agencies, state-chartered and federally-chartered credit unions, and other important stakeholders in the state system. State-chartered credit unions hold half of the nearly $2.46 trillion assets in the credit union system and are proud to represent nearly half of the more than 145 million credit union members.

- 5

ACSSS is the national professional association of state-chartered savings institution regulators.

- 6

See Federal Financial Institutions Examination Council Act of 1978, 12 U.S.C. 3301 *et seq.*; FFIEC, Circular No. 79–191 (Nov. 29, 1979) ("Uniform Rating System").

- 7

See FFIEC, Notice, *Uniform Financial Institutions Rating System*, 61 Fed. Reg. 67021 (Dec. 19, 1996); FFIEC, Notice and Request for Comment, *Uniform Financial Institutions Rating System*, 61 Fed. Reg. 37472 (July 18, 1996).

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